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January 17, 2025

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Patrick Halligan, No. 22-cr-240 (AKH)

Dear Judge Hellerstein:

We write on behalf of our client Patrick Halligan to request permission that the publicly filed copies of Mr. Halligan's sentencing memorandum and letters of support include redactions of certain sensitive information relating to third parties, and the unredacted copies of these filings be accepted for filing under seal.

Pursuant to Fed. R. Crim. P. 49.1 and S.D.N.Y. ECF Rules 21.3 and 21.4, sensitive information subject to redaction in electronic filings includes non-parties' home addresses, the names of minor children, and "medical records, treatment, and diagnosis." The Second Circuit has held that "the privacy interests of innocent third parties should weigh heavily" in the court's public access analysis, and that "family affairs, illnesses, embarrassing conduct with no public ramifications, and similar matters will weigh more heavily against access than conduct affecting a substantial portion of the public." *United States v. Amodeo*, 71 F.3d 1044, 1050-51 (2d Cir. 1995).

The materials that we seek permission to seal contain sensitive information of innocent third parties, including medical information and information related to minors. "[T]he interest in protecting sensitive medical information outweighs the presumption of public access." *United States v. Colon*, No. 18-cr-526, 2023 WL 8281766 at *2 (S.D.N.Y. Nov. 29, 2023) (permitting defendant to redact minor daughter's medical information from sentencing submission). *See also, e.g., United States v. Tavaréz*, 2024 WL 2327366 at *1 (S.D.N.Y. May 22, 2024) (permitting defendant to "propose narrowly tailored redactions of any sensitive medical information contained in his motion").

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We have filed redacted versions of Mr. Halligan's sentencing memorandum and letters of support on ECF, and we enclose with this letter unredacted copies of these materials that indicate the portions that we ask to be accepted for filing under seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mary Mulligan", with a long, sweeping horizontal flourish extending to the right.

Mary E. Mulligan
Timothy M. Haggerty

cc: All Counsel (by e-mail)